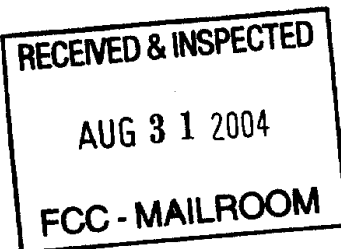


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Before the  
Federal Communications Commission  
Washington, D.C. 20554



In the Matter of:

Broadcast Localism

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MB Docket No. 04-233

### Comments of the American Farm Bureau Federation

Pursuant to 47 C.F.R. §§ 1.415 and 1.419, the American Farm Bureau Federation (AFBF) submits these comments in response to the FCC's Notice of Inquiry released July 1, 2004, concerning Broadcast Localism, specifically paragraphs 13 through 15. AFBF strongly supports this proceeding to initiate a dialogue with the public on how the Commission can best ensure that broadcasters fulfill their obligations to serve their communities of license. AFBF commends the Commission for this effort and will direct these remarks to a communications issue of vital importance to our membership: the serious decline in agricultural news programming on radio.

AFBF is the nation's largest farm organization with over 5.5 million member families. Farm Bureau's public policy positions are developed at the grassroots level to ensure that they reflect the views of our rural membership.

AFBF's statement of public policy with respect to broadcast media demonstrates the importance of this issue to rural, agricultural communities: "To make vital decisions, farmers and ranchers need detailed and timely weather information, local news, up-to-the-minute market reports and news affecting production agriculture. We encourage all radio and television stations to maintain and improve their agricultural services."

This policy is not supported by the trends in radio today. Instead of improving and maintaining their agricultural services, many radio stations are eliminating or curtailing farm news. According to figures supplied to us by the National Association of Farm Broadcasters, the number of on-air broadcasters in the NAFB has declined to 136, down from 225 in 1998. Recently, two 50,000-watt radio stations, WCCO Minneapolis and WGN Chicago cut their farm programming. After 80 years of reporting farm news, WCCO dropped it altogether. The WGN Noon Show (weekday farm report and agribusiness show) was reduced from 45 minutes of news to brief market updates.

This trend is disturbing to us, but not inexplicable. Our review of the problem identified several factors. In the late 1990s, large ownership groups acquired hundreds of radio licenses following changes in media ownership rules. In some states, this consolidation has lead to wholesale dismissal of staff members at individual stations and production of programs at one headquarters station or corporate office.

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National farm advertising has dropped 45 percent in the last five years. Local farm advertising declined even before that. The declines can be attributed to a weaker farm economy, a consolidation of farm industry companies and fewer new product offerings, especially in the crop protection area. There are signs now that the agribusiness climate is getting better because of a stronger farm economy.

Newspaper accounts of the changes at WGN, WCCO and other radio stations noted the decline in advertising dollars. Station managers and program directors also were quoted as saying they felt a need for programming that appealed to a wider audience, and they believed that farmers could get the same information elsewhere.

AFBF does not deny that there are other sources for commodity market and weather news, including subscription-based, satellite-delivered information services and a small number of web sites. However, farmers are quite mobile during their workday and have always relied heavily on radio because it can follow them anywhere. Anecdotal and quantitative research shows that in many areas of the country, farm radio remains a valued, useful source of information for producers. For example, shortly after WGN Radio announced it was ending the Noon Show, the discovery of a BSE infected cow in the United States became news. WGN farm director Orion Samuelson was on the air repeatedly throughout the broadcast day explaining to consumers what this meant to them.

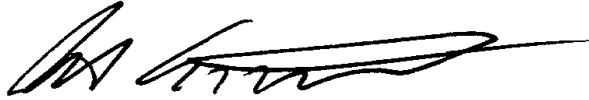
Our summary of the problem is this: the decline in advertising dollars to support farm radio has made it vulnerable. Unless station managers and owners have a strong commitment to their rural audience, the drop in revenue is a convenient excuse to remove farm programming. As a result, broadcasters are not serving the interests and needs of their rural communities.

In recent years, most farm broadcasters have tried to broaden their appeal to a consumer audience and to the growing number of people who are moving to semi-rural areas to enjoy a rural lifestyle. At the national, state and county level, Farm Bureau is doing what it can to support farm broadcasting. Some state Farm Bureaus and affiliated companies are purchasing advertising only from stations with farm programming. Farm Bureaus occasionally pay some of the expenses of local farm broadcasters to cover meetings or events. And Farm Bureau is developing an awareness campaign regarding the plight of farm broadcasting as well as encouraging letters to radio stations from farmers and ranchers.

AFBF hopes that whatever actions are taken to improve levels of community service by radio include the needs of rural audiences, especially farmers who depend on local news, weather and markets. While an urban listener may have many stations to choose from on AM and FM and can find the format that suits his or her interests, that is not the case in rural areas. There are fewer stations and those that exist may be part of the same ownership group. And as pointed out earlier, the 50,000-watt stations that once were important to rural listeners now are abandoning those listeners.

In conclusion, AFBF recognizes the market forces affecting radio, and the role they play in the decline of farm broadcasting. However, this does not negate the fact that many stations have a rural audience that is no longer being adequately served. If the FCC proceeds in some manner to encourage more community-responsive programming, AFBF strongly urges the FCC to include farm programming in that initiative.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Bob Stallman', written over a horizontal line.

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Bob Stallman  
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August 30, 2004